**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

JOHN T. LAMONT and PRESTON POULTER,	§ § §	
Plaintiffs,	§ §	
v.	§ §	Civil Action No. 3:21-CV-1176-K-BN
DEAN ASSAF A/K/A DA TALK VICTORIA KUNDERT A/K/A VIKKIVERSE, AND ETHAN VAN SCIVER.	§ § § § § §	
Defendants.	§ §	

MOTION FOR LEAVE TO PROCEED WITHOUT LOCAL COUNSEL

Pursuant to Local Rule 83.10(a), Defendant Dean Assaf respectfully requests the Court grant him leave to proceed without local counsel.

The undersigned lead counsel for Defendant resides and works about three miles from the district and less than 20 miles from the courthouse. Additionally, the undersigned counsel for Defendant has been continually admitted to practice before this Court since April of 2006, has appeared in this district many times, and is familiar with (and will abide by) the local rules. Moreover, for a majority of the undersigned's career, he has worked and resided in the district. He also previously appeared in this matter on behalf of a defendant that subsequently was dismissed from the case.

Although the undersigned counsel for Defendant does not meet the definition of "Local Counsel" under the Local Rules, Defendant and undersigned counsel believe that given the undersigned's proximity to the courthouse and experience in the district, the goals advanced by

the requirement of local counsel are met here. Accordingly, Defendant respectfully requests leave

to proceed without local counsel.

Dated: September 1, 2023   Respectfully submitted,

                                                           /s/ Thomas J. Adair_____
                                                           Thomas J. Adair
                                                           Texas Bar No. 24047753
                                                           ADAIR LAW, PLLC
                                                           1112 18th Street, #862017
                                                           Plano, Texas 75074
                                                           Telephone: (512) 431-2736
                                                           tom@adairlaw.com

                                                           Attorney for Defendant Ali Dean Assaf

CERTIFICATE OF CONFERENCE

I hereby certify that on September 1, 2023, I conferred by phone with Plaintiffs' counsel, Jeremy Masten, who advised that Plaintiffs are unopposed to the relief requested in this Motion.

                                                           /s/ Thomas J. Adair_____
                                                           Thomas J. Adair